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March 26, 2014

*To:*

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*And:*

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**Subject: U.S. Public Health Service Officers in the U.S. Pacific Islands**

Dear Admiral Lushniak and Administrator Blumenfeld:

We, the Directors and Administrators of the U.S. Pacific Island Territories' Environmental Regulatory Agencies and Water/Wastewater Utilities, are jointly sending this letter to express our support for, and to request the continuing assistance of, the U.S. Public Health Service (USPHS) Commissioned Corps and the U.S. Environmental Protection Agency (USEPA) in the provision of experienced, highly qualified officers to assist with our organizations' technical public health and environmental needs. This assistance, which had previously been provided by your two agencies for several decades, has been suspended now for almost three years, due to problems for which we understand there may be solutions.

The Pacific Islands Territories have had a long relationship with USPHS officers serving on the behalf of the USEPA. This began in the 1970s, shortly after the formation of the USEPA, and continued until July, 2011, when we were informed that there were problems with the way in which officers were being detailed to the islands. Consequently, the number of officers serving in



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our agencies has dropped from eight to just two, and these two will be gone soon if no action is taken to correct the problems. Our understanding is that this is not an issue of funding, but an issue of legal authority to place officers within Territorial or Commonwealth government agencies and government-operated utilities. We further understand that there are several alternative methods by which this problem can be solved.

We do not intend to question or debate the legal authority issue, as this involves internal, Federal agency policy and rules of which we are not fully knowledgeable. We do wish, however, to express our disappointment and frustration that a solution has not yet been implemented. What we hope to accomplish in writing you is to express the tremendous public health and environmental benefits this arrangement has provided to our agencies and territories in the past, and to ask for your assistance in ensuring that it continues for the future.

The ability to obtain professional engineering and environmental health officers from the USPHS has been very beneficial to our agencies. These officers have held positions which are notoriously hard to fill, for reasons including the distant and relatively isolated location of the Pacific Islands, the sometimes difficult living conditions, as well as the low pay scales offered by island governments. USPHS officers can be counted on to move sight-unseen to remote locations and serve their terms without complaint. USPHS officers are also a known quantity, in terms of skills, experience, and work history, and are often able to “hit the ground running” with no additional training and fewer surprises in terms of what is offered on a resume versus a candidate’s actual skills.


Finally, each of our agencies has had excellent experience with USPHS officers in terms of the leadership and initiative they have displayed in not only getting the job done for which they were requested, but also stepping beyond their job descriptions to take on additional environmental and public health challenges, as well as inspiring and building the capacity of our island staff. As you may or may not be aware, our territories continue to struggle with fundamental public health necessities, from the provision of safe drinking water, to the sanitary treatment of both human and animal wastes. We have made great strides in improving conditions, but there is still a long way to go, and every possible form of assistance is welcomed.

We therefore, respectfully ask for your support and assistance in solving the current problems with detailing USPHS officers to the U.S. Pacific Island Territories. We understand that this represents a very small percentage of your respective workforces, but for our communities it represents an imposingly large, valuable and difficult to replace resource. From an outside perspective, the efforts required to resolve this situation may seem disproportionate to the potential benefits. We hope that your offices can see past this perception, and in return, we are prepared to offer whatever assistance we can, including but not limited to the time and talents of the remaining two officers detailed to the Pacific, CAPT Derek Chambers, MPH, PE, ([derekchambers@deq.gov.mp](mailto:derekchambers@deq.gov.mp)) and LCDR Brian Bearden, PE ([brian.bearden@cucgov.org](mailto:brian.bearden@cucgov.org)) .

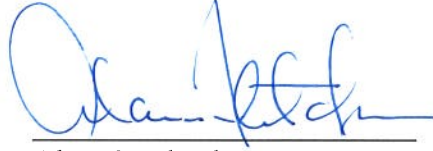
We would appreciate a written response to this letter from both your agencies, affirming your support for solving these problems, and establishing an initial timeline and strategy for doing so. We would also like to establish a temporary working group, for the purposes of updating

progress and accomplishing the necessary work to get this situation resolved. For that purpose, we suggest e-mail, for now, as a means of scheduling regular status calls. If using e-mail, please ensure that each of us are copied in the correspondence. Our respective e-mail addresses are included in the letterhead.

Sincerely,



Frank M. Rabauliman,  
Administrator, CNMI BCEQ



Alan W. Fletcher,  
Executive Director, CNMI CUC

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Utu Abe Malae,  
Executive Director, ASPA

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Ameko Pato,  
Director, ASEPA

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Eric M. Palacios,  
Administrator, Guam EPA

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Simon Sanchez,  
Chairman, Guam CCU

cc:

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Chief Engineer Officer, USPHS  
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Susan Kantrowitz  
Director, USEPA Office of Human Resources  
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John McCarroll, P.E.  
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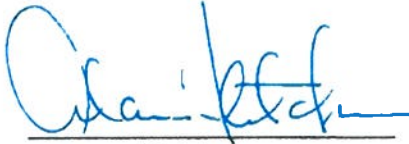
CAPT Nelson Mix, P.E., CHMM  
USEPA's Representative to the Surgeon General's Policy Advisory Council (SGPAC)  
[mix.nelson@epa.gov](mailto:mix.nelson@epa.gov)

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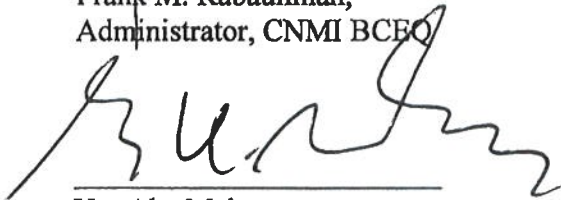
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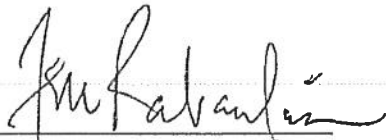
Susan Kantrowitz  
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John McCarroll, P.E.  
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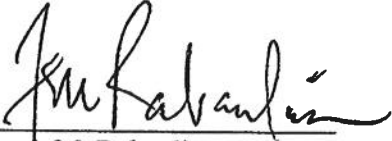
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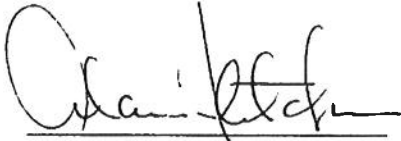
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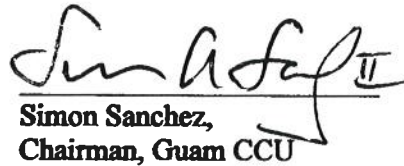
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